

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

YESHIVA GEDOLA NA'OS YAAKOV, INC.,
a New Jersey nonprofit corporation, and
ZEBRA HOLDINGS II LLC,

Plaintiffs,

vs.

TOWNSHIP OF OCEAN, N.J. and ZONING
BOARD OF ADJUSTMENT OF THE
TOWNSHIP OF OCEAN,

Defendants.

Civil No. 3:16-00096 (FLW) (DEA)

DECLARATION OF
ZEEV ROTHSCILD

ZEEV ROTHSCILD, under penalty of perjury under the laws of the United States of America, does hereby declare and certify pursuant to 28 U.S.C. § 1746 that the following statements are true and correct:

1. I am the principal of Zebra Holdings II LLC, a plaintiff in this matter.
2. Zebra Holdings II LLC owns real property located at 1515 Logan Road in Ocean Township, New Jersey, the subject property in this matter (the "Property").
3. Zebra Holdings II LLC purchased the Property from the Deal Yeshiva, which operated a boarding school at that location from 1997 through 2011.
4. The Deal Yeshiva had operated with approximately 150-200 students, with 50 boarding students.
5. The Deal Yeshiva was a Haredi, or "ultra-Orthodox" Jewish religious school.
6. From 2011 through the present, the Property has been leased to the Yeshiva at the Jersey Shore, which operates an elementary day school for approximately 101 students.

7. To date, Zebra Holdings II LLC has expended approximately \$243,000 on the Yeshiva's application for use variance before the Ocean Township Zoning Board of Adjustment.
8. Zebra Holdings II LLC is also subject to property taxes of approximately \$40,000 per year which would not be charged if the Yeshiva Gedola Na'os Yaakov's non-profit use was permitted.

Executed on February 2, 2016



Zeev Rothschild